



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

May 19, 2008

Reply To
Attn Of: ETPA-088

Ref: 06-067-AFS

Mr. Chad Benson, District Ranger
Powell Ranger Station
Lolo, MT 59847

Dear Mr. Benson:

The US Environmental Protection Agency (EPA) has reviewed the draft Environmental Impact Statement (DEIS) for the proposed **Selway Bitterroot Wilderness Invasive Plants Management Project** on Nez Perce, Clearwater, Bitterroot, and Lolo National Forests in western Montana and north central Idaho. Our review was conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA). Section 309 of the CAA specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Under our policies and procedures, we also evaluate the document's adequacy in meeting NEPA requirements.

The draft EIS analyzes potential environmental effects of a proposal to apply integrated and adaptive approaches to prevent the establishment of new invasive plants and reduce the impacts of existing invasive plants on native plant communities in the Selway Bitterroot Wilderness (SBW) and surrounding public lands where invasive plants are expanding rapidly. The project area would be nearly 1.4 million acres, including 1.35 million acres of the SBW and 31,000 acres of Inventoried Roadless Area (IRA). The treatments, which would be ground-based, would include herbicide applications, release of bio-control agents, and mechanical means to control invasive plants in the next 5-15 years. Within the SBW, herbicide applications would only be through selective, hand-operated, spray applications using backpack and stock-mounted sprayers.

In assessing what environmental effects would be associated with the proposed action, FS developed and analyzed five alternative actions (1-5) including a No Action. Under the No Action, current invasive plant management would continue without change. As a result, invasive plant species would continue to expand into new areas, increase in number, and generate associated effects. Of all five proposed actions, the **Preferred Alternative** (Alternative 5) is to continue to use all currently approved weed treatment strategies and methods, and expand areas of herbicide and mechanical/cultural treatments to about 4,125 and 100 acres per year, respectively, and bio-control to 50,000 acres over the life of the project. With this action, all trails and associated camps, trailheads, Selway River camps, administrative sites, airstrips, private land buffers, dams sites, and other infested areas would be treated, as well as roads inside the project area but outside the SBW.

If implemented as presented in the draft EIS, the FS believes that treatments and strategies under the Preferred Alternative would be highly effective in reducing the effects of non-native invasive plant species on natural plant communities and ecosystems within the project area, while protecting people and

the environment. Activities under the Preferred Alternative would also help to maintain the natural conditions of the Wilderness in accordance with the 1964 Wilderness Act.

EPA understands the risks invasive plants pose to resources within the SBW and adjacent areas if not treated. Thus, we appreciate FS planning efforts for this project, especially the consideration of Integrated Noxious Weed Management (INWM) and Adaptive Management strategies, as well as plans to apply herbicides by hand using Best Management Practices (BMPs). However we have concerns about the project's potential to further degrade water quality within a number of water bodies that presently do not meet water quality standards. We recommend that the FS continue to work with Idaho and Montana Departments of Environmental Quality to assure that these States' water quality standards would be met throughout the implementation of the proposed program. The FS should also coordinate with the Confederated Salish and Kootenai Tribes of the Flathead Nation and the Nez Perce Tribe to address their water quality issues, if any. The final EIS should include additional information as explained in our comments that follow.

Water quality

As we indicated in our scoping comments in December 2006, water quality degradation is one of EPA's primary concerns. Section 303(d) of the Clean Water Act (CWA) requires each State and Tribe with approved water quality standards to identify water bodies that do not meet water quality standards and to develop water quality restoration plans to meet established water quality criteria and associated designated uses.

While the draft EIS identifies impaired water bodies within the project area and the associated beneficial uses (p. 3.3-4 - 6), it does not include information about water quality criteria to protect the beneficial uses (i.e., numeric water quality standards exceedences for which waters are listed). Without this information, it is difficult to know whether or not the proposed weed treatments will exacerbate conditions in impaired streams. Also, information about the status of water quality restoration plans for all 303(d) listed waters (p. 3.3-28) was not included in the draft EIS. Additional information that may be useful can be found in a recent Memorandum Of Agreement (MOA) (September 28, 2007) between EPA and FS which identifies specific actions that can be taken to address water quality impairments and restoration on national forest system lands.

The EIS anticipates there would be greater direct effects to water quality and aquatic life from herbicide treatments under the Preferred Alternative. Because the level of herbicides that may reach waterways and potential adverse sublethal effects remain unknown (p. 3.3-32), it is possible that the impacts could be even more significant than anticipated. In particular, where treatments would occur closer to 303(d) listed waters or road ditches that drain into waterways, the treatments could further degrade water quality within those waters.

Recommendations:

- *The final EIS should identify parameters for which impaired streams are listed. The final EIS should also include information regarding the status of Total Maximum Daily Load(s) and other plans designed to protect and restore water quality.*
- *The final EIS should identify added precautions that will be used when applying treatments near streams or road ditches that drain in the streams to minimize or avoid drift impacts and sublethal effects to aquatic life. For example, FS should avoid application of Picloram and other herbicides with very high movement rate to water sources within annual flood plains with water table close to the surface and high soil permeability.*

Monitoring

Monitoring and reporting (pre-, mid-, and post-season) will also be valuable components of the proposed invasive plant treatment project. It is important to monitor results of weed treatment activities to document and assure effective weed treatment with minimal impacts on non-target species and avoidance of other adverse environmental or public health effects. Monitoring should incorporate elements such as 1) density and rate of weed spread and their effects; 2) effects of herbicides on noxious weeds and non-target plant mortality; 3) establishment and effectiveness of biological control agents; 4) presence of herbicide in surface or ground water in high risk areas (i.e. accidental spills, aerial application); and 5) implementation of protection measures. Overall and as this project progresses, we would be interested in hearing about the results of the proposed treatments in terms of their effectiveness of control and environmental consequences, and in meeting the goals of the 1964 Wilderness Act.

Other

On page 3.3-24 and 34, the draft EIS refers readers to information in Appendix I, Table 6. Please include Table 6 of Appendix I in the final EIS.

Because of concerns about water quality and missing or unclear information, we have assigned a rating of EC-2 (Environmental Concerns – Insufficient information) to the Preferred Alternative. This rating and a summary of our comments will be published in the *Federal Register*. For your reference, a copy of our rating system used in conducting our review is attached.

Thank you for the opportunity to provide comments on this draft EIS. If you have questions about our comments, please contact Theo Mbabaliye at (206) 553-6322 or me at (206) 553-1601.

Sincerely,

/s/

Christine B. Reichgott, Manager
NEPA Review Unit

Enclosures

cc:

EPA Region 8, Montana Office
EPA Idaho Operations Office
Nez Perce Tribe
Confederated Salish and Kootenai Tribes of the Flathead Nation